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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

PARNELL JAY FAIR,

Plaintiff,

vs.

LAS VEGAS METROPOLITAN POLICE
DEPARTMENT, a political subdivision of
the State of Nevada; L. TURLEY P# 15885
individually; A. RYNDAK P# 16540,
individually; UNIVERSITY MEDICAL
CENTER, D/B/A UNIVERSITY MEDICAL
CENTER OF SOUTHERN NEVADA, a
Nevada Governmental Entity; CHASITY
TRAVIS, individually; JENNA A. DOUD;
individually; JESSE WELLS, individually;
SHAIN HOWARD, individually; SCOTT
KEVIN LEE, individually; BROCK T.
WENTZ, individually; DOES I - X, and
ROES I - X, inclusive ,

Defendants.

Case No. 2:20-cv-01841-JCM-BNW

[PROPOSED] STIPULATION AND
ORDER TO STAY DISCOVERY

Plaintiff, PARNELL JAY FAIR, by and through his counsel of record ANDRE M.
LAGOMARSINO, ESQ. and DAVEN P. CAMERON, ESQ. of the law firm of
LAGOMARSINO LAW; Defendants UNIVERSITY MEDICAL CENTER and CHASITY
TRAVIS, through their counsel of record JEFFREY I. PITEGOFF, ESQ. of the law firm of
PITEGOFF LAW OFFICE; Defendants LAS VEGAS METROPOLITAN POLICE
DEPARTMENT, LUKAS TURLEY, and ALEXANDER RYNDAK, through their counsel of
record LYSSA S. ANDERSON, ESQ., RYAN W. DANIELS, ESQ., and KRISTOPHER J.

1 KALKOWSKI, ESQ. of the law firm of KAEMPFER CROWELL; Defendant BROCK T.
2 WENTZ, D.O., through his counsel of record KEITH A. WEAVER, ESQ. and MELANIE L.
3 THOMAS, ESQ. of the law firm of LEWIS BRISBOIS BISGAARD & SMITH LLP;
4 Defendants JENNA DOUD and JESSE WELLS, by and through their counsel of record
5 ROBERT C. MCBRIDE, ESQ. and SEAN M. KELLY, ESQ., of the law firm of MCBRIDE
6 HALL; Defendant SHAIN HOWARD, by and through his counsel of record ANTHONY D.
7 LAURIA, ESQ., of the law firm of LAURIA TOKUNAGA GATES & LINN, LLP, CASEY
8 ALLEN ROEHR, by and through his counsel of record KATHERINE J. GORDON, ESQ., of
9 the law firm of LEWIS BRISBOIS BISGAARD & SMITH LLP, SCOTT KEVIN LEE, by and
10 through his counsel of record JOHN H. COTTON, ESQ. and BRAD J. SHIPLEY, ESQ., of
11 the law firm of JOHN H. COTTON & ASSOCIATES, LTD, hereby stipulate as follows:

12 1) Discovery shall be stayed pending ruling on the Defendants' motions to
13 dismiss, subject to potential lifting of the stay upon terms and conditions that the parties
14 and the court deem just;

15 2) The discovery stay shall include all discovery already served, and not yet due,
16 which to-date is as follows:

17 a) Plaintiff's First Set Of Requests For Production Of Documents To
18 Jesse Wells;

19 b) Plaintiff's First Set Of Interrogatories To Defendant Jesse Wells;

20 c) Plaintiff's First Set Of Requests For Production Of Documents To
21 Defendant Chasity Travis;

22 d) Plaintiff's First Set Of Interrogatories To Defendant Chasity Travis;

23 e) Plaintiff's First Set Of Requests For Production Of Documents To
24 Defendant Casey Roehr;

25 f) Plaintiff's First Set Of Interrogatories To Defendant Casey Roehr;

26 g) Plaintiff's First Set Of Requests For Production Of Documents To
27 Defendant Shain Howard;

28 h) Plaintiff's First Set Of Interrogatories To Defendant Shain Howard;

i) Plaintiff's First Set Of Requests For Production Of Documents To Defendant University Medical Center;

j) Plaintiff's First Set Of Interrogatories To Defendant University Medical Center;

k) Plaintiff's First Set Of Interrogatories To Defendant Jenna Doud;

I) Plaintiff's First Set Of Requests For Production Of Documents To Defendant Jenna Doud;

m) Plaintiff's First Set of Requests for Production of Documents to Defendant Las Vegas Metropolitan Police Department;

n) Defendant Las Vegas Metropolitan Police Department's First Set of Requests for Admissions to Plaintiff;

o) Defendant Las Vegas Metropolitan Police Department's First Set of Requests for Production of Documents to Plaintiff; and,

p) Defendant Las Vegas Metropolitan Police Department's First Set of Interrogatories to Plaintiff.

3) The parties request the Court to set a status check sometime in March 2021, to discuss the pendency of Defendants' motions to dismiss. If the motions to dismiss have not been decided at the time of the status check, the Plaintiff will move to reopen discovery at the status check hearing; however, the Defendants' reserve their right to file a motion to stay discovery pending decision on their motions to dismiss but hereby enter this stipulation to avoid motion practice at this time.

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1 IT IS SO STIPULATED AND AGREED

2 Dated: January 5, 2021

3 LAGOMARSINO LAW

5 /s/ Daven P. Cameron

6 ANDRE M. LAGOMARSINO, ESQ.
7 Nevada Bar No. 6711
8 DAVEN P. CAMERON, ESQ.
9 Nevada Bar No. 14179
3005 West Horizon Ridge Parkway,
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Henderson, Nevada 89052
Attorneys for Plaintiff

11 Dated: January 8, 2021

12 PITEGOFF LAW OFFICE

14 /s/ Jeffrey Pitegoff

15 JEFFREY I. PITEGOFF, ESQ.
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17 Las Vegas, Nevada 89128
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*Attorney for Defendants University
Medical Center and Chasity Travis*

19 Dated: January 5, 2021

20 JOHN H. COTTON & ASSOCIATES,
LTD.

22 /s/ Brad J. Shipley

23 JOHN H. COTTON, ESQ.
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24 BRAD J. SHIPLEY, ESQ.
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7900 West Sahara Avenue, Suite 200
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*Attorneys for Defendant Scott Kevin
Lee*

27 / / /

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Dated: January 5, 2021

KAEMPFER CROWELL

5 /s/ Lyssa S. Anderson

6 LYSSA S. ANDERSON, ESQ.
7 Nevada Bar No. 5781
8 RYAN W. DANIELS, ESQ.
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*Attorneys for Defendants LVMPD, Lukas
Turley, and Alexander Ryndak*

Dated: January 5, 2021

MCBRIDE HALL

5 /s/ Sean Kelly

6 ROBERT C. MCBRIDE, ESQ.
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*Attorneys for Defendant Jenna Doud and
Jesse Wells*

Dated: January 5, 2021

LAURIA TOKUNAGA GATES & LINN,
LLP

5 /s/ Anthony D. Lauria

6 ANTHONY D. LAURIA, ESQ.
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601 South Seventh Street
Las Vegas, Nevada 89101
Attorney for Defendant Shain Howard

1 Dated: January 5, 2021

2 LEWIS BRISBOIS BISGAARD & SMITH
3 LLP

4 /s/ Katherine J. Gordon
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7 6385 S. Rainbow Blvd., Ste. 600
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9 *Attorneys for Defendant Casey Roehr*

Dated: January 5, 2021

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LLP

/s/ Melanie L. Thomas
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10 *Attorneys for Defendant Brock T. Wentz,
D.O.*

11 ORDER

12 IT IS ORDERED that the parties' stipulation is GRANTED. Discovery is stayed pending the
district judge's ruling on the Defendants' motions to dismiss.

13 IT IS FURTHER ORDERED that a status check is set for 3/23/2021 at 10:00 AM in LV courtroom
14 3B by videoconference before Magistrate Judge Brenda Weksler. The hearing will take place via
Zoom videoconference. To receive a Zoom invitation, counsel must contact courtroom
administrator Jeff Miller at jeff_miller@nvd.uscourts.gov no later than noon on the day prior to the
hearing and no sooner than one week prior to the hearing.

15 **IT IS SO ORDERED**

16 **DATED:** 5:20 pm, January 12, 2021

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19 **BRENDA WEKSLER**
20 **UNITED STATES MAGISTRATE JUDGE**